



COMMONWEALTH of VIRGINIA
Office of the Attorney General

900 East Main Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

Mark R. Herring
Attorney General

MEMORANDUM

TO: William L. Harp, M.D.
Executive Director
Virginia Board of Medicine

FROM: Erin L. Barrett
Assistant Attorney General

DATE: November 2, 2016

SUBJECT: *Regulations Governing the Practice of Radiologic Technology*
18VAC85-101-10 *et seq.*

I have reviewed the proposed amendments to the Regulations Governing the Practice of Radiologic Technology, 18VAC85-101-10 *et seq.* The proposed amendments repeal regulations which provided for traineeships of unlicensed graduates of radiologic technologist and radiologic technologist-limited programs. The Board has the statutory authority to amend these regulations under Virginia Code §§ 54.1-2400(6) and 54.1-2956.8:1. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.